

Our Ref: 208082-01/Letter 009

Contact: Philip Paton



13 February 2009

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**RE: S02/00615 – PROPOSED MALTING PLANT, MINTO  
FULL RESPONSE TO LIPA SUBMISSION**

I am writing to provide DoP with ABB Grain Limited's full reply to the submission made by Lipa Pharmaceuticals in relation to NO<sub>x</sub> and odour emissions associated with the proposed malting plant.

Holmes Air Sciences have prepared the attached report, in response to these issues. The NO<sub>x</sub> response is the same information as sent to DoP by letter dated 14 January 2009. The attached report repeats this NO<sub>x</sub> assessment for ease of reference. We remain confident that the NO<sub>x</sub> assessment appropriately addresses the issues raised by Alex Jochelson.

Representatives from Holmes Air Sciences and Cardno visited the Lipa Pharmaceuticals property on Stonny Batter Road on 9 February 2009. The aim was to obtain information from Lipa and view their ventilation system to assist Holmes Air Sciences prepare the attached report.

Homes Air Sciences were provided with information relating to the external aspects of the ventilation system but were not permitted to view the internal ventilation system or have a tour of the building.

At the 9 February meeting, Lipa conceded to Holmes Air Sciences and Cardno representatives that their odour concerns might be unfounded. This is because they have no accurate method of assessing the possible threat. It is also noteworthy that Holmes Air Science's informal discussions with industries around the JWM site identify that these (including Lipa Pharmaceuticals) emit odour. It is considered that odour from the JWM agricultural processing land use would have no worse impact on the Lipa product than odour from existing industrial land uses.

Further unnecessary delays to this application would be unreasonable because of Lipa submitting an objection that may be unfounded and is based on their worst-case scenario fears. The proposed malting project has significant local and state benefits and no discernable drawbacks. JWM wish to progress and to this end, the Holmes Air Sciences report considers the Lipa objection on available information.



In relation to NO<sub>x</sub>, the Holmes Air Sciences report concludes that emissions from the proposed malting plant would be very localised and the NO<sub>x</sub> emissions prediction in the air quality report submitted with the project EA (quote below) remain correct. It should be understood that the ambient NO<sub>x</sub> environment is already subject to heavy road, rail and other business operations.

*"Therefore it is very unlikely that the gas burners would result in any exceedences of the NO<sub>2</sub> air quality goals at any sensitive receptors" (p9, Holmes Air Sciences, 2008, Air Quality & Odour Assessment: Proposed Malting Facility & Packing Plant).*

Taking the malting plant modelled odour emissions, the Lipa external ventilation system and anticipated activities in the Lipa property into account the Holmes Air Sciences assessment concludes, "there is unlikely to be any perceptible effect on Lipa products at the odour concentrations likely to occur due to JWM operations".

At the 9 February meeting, Lipa also advised of concerns regarding rodents being attracted to the malting plant. JWM is well aware from its operations around Australia of the importance of the management of rodent activity. Section 8.3 of the EA assesses this possible impact and advises that as an export facility JWM must meet Australian Quarantine Inspection Service (AQIS) standards. To this end, JWM has active test control procedures in place to manage this issue through the following processes:

- Setting traps and poisons for rodents
- Programmed maintenance of baiting plan
- Adherence to strict health standards
- Building design to prevent rodent entry
- Immediate cleaning of any grain spills.

The attached Rodent Control Plan is from an active malting facility and demonstrates active pursuit of rodent control. JWM will implement a similar control directive for the proposed Minto facility to ensure minimal rodent impacts due to their location in the area.

If there are any questions on this matter, please contact me on (02) 4228 4133.

Yours faithfully



Philip Paton (Project Manager / Town Planner)  
for **Cardno**

C.C. Andrew MacGee (Campbelltown City Council)  
Craig Patterson (Department of Environment  
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